

WISHA REGIONAL DIRECTIVE

WISHA Services

Department of Labor and Industries

32.75 IDLH IN RELATION TO INDUSTRIAL FIRE BRIGADES

Date Issued: December 30, 1996

I. Background:

On May 1, 1995, the federal Occupational Safety and Health Administration (OSHA) issued an interpretation that specifies that established occupational fire protection standards require a minimum of four persons to be on the scene before initiating interior structural fire fighting operations.

This WISHA Regional Directive provides comparable guidance in relation to the Washington Industrial Safety and Health Act (WISHA), specifically related to WAC 296-24-5805 through 58517, the Fire Brigade Standard (FBS). It is important to note that these requirements are limited to interior structural fires, consistently recognized to represent conditions immediately dangerous to life and health (IDLH). Incipient fires are not covered by this policy since, by definition, they do not represent IDLH conditions and can be extinguished without the need for protective clothing or self-contained breathing apparatus (SCBA). Neither the standard nor this WRD cover municipal and other public fire departments (volunteer or paid), which are subject to Chapter 296-305 WAC.

II. Scope and Application:

This WISHA Regional Directive, which will remain in effect indefinitely, applies whenever WISHA compliance staff encounter industrial fire brigades that may be involved in fighting interior structural fires in IDLH situations. This WRD incorporates the substance of WISHA Interim Interpretative Memorandum #96-4-E, which is hereby repealed.

III. Interpretive Guidance:

A. Are standby persons required during IDLH firefighting?

Neither the federal standard nor Washington's current FBS directly require a minimum of two standby persons at IDLH incidents. Like other employees, however, fire brigade members are subject to the respiratory protection standard, which is in fact specifically referenced in WAC 296-24-58515(1)(a). The relevant

portion of the respiratory protection standard, WAC 296-62-07115(1)(b)(iv), requires "standby workers" whenever SCBAs are used in IDLH atmospheres; although the standard does not specify a number, the use of the plural clearly distinguishes itself from other requirements where a single worker is sufficient.

B. Is the "buddy system" required during IDLH firefighting?

Within the FBS, neither OSHA nor WISHA have an explicit requirement for the use of a "buddy system" -- requiring teams of two or more to be assembled before initiating interior structural fire fighting operations. However, this requirement has been established by the National Fire Protection Association (NFPA) standard on Industrial Fire Brigades (NFPA 600-1992, 5-3.5) and the NFPA standard on Fire Department Occupational Safety and Health Program (NFPA 1500-1992, 6-4.3). Both standards recognize that fire fighters (entrants) "shall operate in teams of two or more" when conducting interior structural fire fighting operations.

IV. Special Inspection Protocols:

A. When must staff cite the lack of a standby firefighter?

WISHA compliance staff must cite a violation of WAC 296-62-07115(1)(b)(iv) in cases where it has been documented that fewer than two persons were "standing by" when an interior structural fire fighting operation was being conducted by firefighters subject to the FBS.

B. When must staff cite the failure to use the "buddy system"?

WISHA compliance staff shall cite a violation of WAC 296-24-073(2) in cases where it has been documented that interior structural fire fighting operations were conducted by one or more individual firefighters subject to the FBS operating singly. Documentation shall reference NFPA 600-1992 section 5-3.5 which requires that "Members using SCBA(s) shall operate in teams of two or more who are in communication with each other through visual, audible, physical, safety guide-rope, electronic, or other means to coordinate their activities, and are in close proximity to each other to provide assistance in case of an emergency."

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POLICY & INTERPRETIVE STATEMENT SUBMITTAL FORM
Legislative and Governmental Affairs

Briefly state the subject matter of the Policy or Interpretive Statement:

This WISHA Regional Directive provides OSHA comparable guidance regarding Industrial Fire Brigades and IDLH atmospheres.

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Signature of Responsible Official (Assistant Director)

Date WRD, Policy or Interpretive Statement Issued: _____

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Marie Myerchin-Redifer in the Legislative and Governmental Affairs Office, 902-4205
